

Oak Ridge Reservation EMDF ROD (draft 1 issued on 7/12/21) – Status of Remaining Issues

Issue	Progress	Next steps	Needed for public comment
ARARs in ROD	EPA, TDEC and DOE participated in three discussion/resolution meetings. All parties are aware of the issues. EPA comments will not be a surprise.	EPA will issue preliminary ARAR comments on 9/03/21; final comments NLT 9/27/21.	
Mercury Management Approach	EIT developed draft on 8/16/21. DOE and TDEC comments received. ORC comments pending.	EIT to revised approach per comments. Anticipate resolution by 9/15.	✓
Effluent limits for Radionuclides	Project team developing water quality based effluent limits. 1) Fish consumption rates being negotiated; 2) Assimilative capacity of receiving stream: team suggesting variance from CWA guidance (TN may not agree, WD may not agree), under discussion; 3) “secondary” COC list being negotiated; 4) Treatment of challenging rads being negotiated. 5) Fall fish sampling event pending (post ROD mod if needed)	Anticipate project team recommendation by 10/1/21. Some indication that DOE may not endorse project team result.	✓
Waste Acceptance Criteria (WAC)	EPA has no further comments. TDEC and DOE continue to negotiate.		✓
Comments on D1 ROD	Preliminary draft technical comments (including hydro and eco risk) submitted on 8/11/21. ORC comments received on 8/27/21. HQ comments expected 8/30.	1) HQ comments to R4 on 8/30; 2) Consolidate all comments NLT 9/13; 3) Resolve conflicts in R4/HQ comments; communicate significant comments to TDEC NLT 9/17; 4) R4 briefings, as needed 9/24; 5) Formal comments to DOE NLT 9/27/21; 6) DOE to prepare D2 ROD (tent. 30 days)	
Focused Feasibility Study for Waste Water	Submitted to EPA on 6/23/21 EPA commented on 7/22/21	EPA awaiting DOE’s revision. DOE to revise FFS, including addition of effluent limits for radionuclides and Hg.	

SEMD 8/30/21

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		Finalize before ROD is signed.	
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